## Exhibit "D"

LAW OFFICES

## SMITH & ELY, L.L.P.

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Joel S. Isenberg

December 20, 2005

E-Mail Address: Jisenberg@Smith-Ely.com

## BY FAX TRANSMISSION

Christopher E. Sanspree BEASLEY, ALLEN, CROW, METHVIN PORTIS & MILES, P.C. Post Office Box 4160 Montgomery, Alabama 36103

RE: Donald Bell; Katrina Bell v. Travelers Property Casualty Insurance Company, et

al.

Our File Number: 18043

## Dear Chris:

I am in receipt of your Notice of Service of Discovery of Documents in the above-referenced matter, which was e-filed on December 14, 2005. However, we have not yet received any documents responsive to Standard Fire's discovery requests or your clients' initial disclosures, both of which are overdue. I am assuming that the filing of the Notice with the court, without also serving the discovery on us, was simply an oversight. In any case, please forward them immediately, or correct the court record to reflect that they were not actually served.

Sincerely,

SMITH & ELY, LLP

Joel S. Isenberg

JSI/mtb

cc: Brenen G. Ely